

REMARKS

Claims 5-13 and 27 are pending. Claims 9-11 have been allowed.

Reconsideration of the application is respectfully requested for the following reasons.

In the Final Office Action, claims 5, 7, 8, 12, 13 and 27 were rejected under 35 U.S.C. §103(a) for being obvious over a Vellaikal- Ardizzoni combination. This rejection is traversed for the following reasons.

Claim 5 recites an image search method which determines color similarity between a reference image and a target image, each of which is represented by hierarchical grid levels. The determining step includes cross-matching grid levels of the reference and target images "such that a grid on one level of the reference image is matched to a grid of a different level in the target image." The Examiner indicated that the Vellaikal article does not teach or suggest this quoted feature of claim 5.

To make up for the deficiencies of the Vellaikal article, the Ardizzoni article was cited. The Ardizzoni article has a publication date of September 1, 1999. The effective filing date of the present application February 1, 1999, based on a priority document corresponding to Korean Patent Application No. 3184/1999. (The claim for priority to this document was made with the original application papers.)

To antedate the Ardizzoni article, Applicants have submitted with this paper an English translation of the priority document and a statement indicating that the

translation is accurate. Under the provisions of MPEP §201.15, it is respectfully submitted that the filing of these papers is sufficient to antedate the Ardizzoni article, thereby removing it as a reference against the claims.

With the Ardizzoni article removed, it is respectfully submitted that claim 5 and its dependent claims are allowable. Applicants further submit that claim 13 is also allowable for similar reasons.

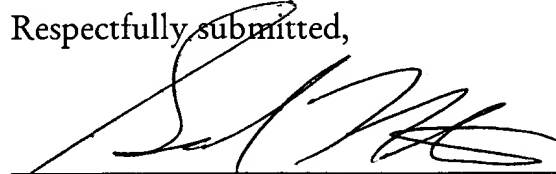
It is respectfully submitted that the remaining rejections have been obviated in view of the cancellation of claims 14-19, 22-26 and 28.

Reconsideration and withdrawal of all the rejections and objections made by the Examiner is hereby respectfully requested.

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of the application is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 CFR § 1.136. Please charge any shortage in fees due in connection with this application, including extension of time fees, to Deposit Account No. 16-0607 (Attorney Docket No. P-082) and credit any excess fees to the same Deposit Account.

Respectfully submitted,



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